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Food Safety and Inspection Service  
Comments on Docket No. 98-045N  
Department of Health and Human Services  
Docket No. 97N-0074  
Environmental Protection Agency  
Docket No. OPP-0055B; FRL-6087-7  
President's Council on Food Safety  
Draft Interagency Food Safety Strategic Plan

Recently we had the opportunity to review the draft goals and objectives published by the President's Council on Food Safety in the Federal Register. We are particularly interested in Goal 4, which addresses training and educational needs: "Ensure that all people who come in contact with food from farm-to-table are fully informed of the risks and measures to prevent and reduce foodborne illness." As members of the Human Resource Development Staff of the Food Safety and Inspection Service (FSIS), we believe we have a unique insight on training and education in this area-how it is now and what needs to be done to make it support the major initiatives outlined in the Council's Food Safety Strategic Plan.

In reading Goal 4, we are not clear whether it is intended as a consumer information goal or as a much broader initiative for training and education across the food safety system, to include farm production personnel; food processing industry personnel; food processing industry personnel; retail and restaurant personnel; federal, state, and local government officials; laboratory personnel; compliance and enforcement personnel; and consumers. From our view, the latter expanded audience for food safety training and education should be the focus to ensure that the strategic plan is implemented successfully. We believe that the Human Resource Development Staff has a vehicle that can help in putting together a comprehensive and integrated training and educational program for the future.

The current training and education program in FSIS is heavily classroom-oriented. We have a substantial contract with a major university to maintain a single training facility almost exclusively for the use of our internal inspection workforce. We believe that classroom training and education has had great value in the past and that the quality of the experience has generally been good. However, the costs associated with travel to the facility, lodging and meals for personnel while at the

facility, and, in the case of FSIS, providing relief personnel to cover the assignments of those inspectors assigned to training, is very high. The agency must confront these costs in a time of declining resources both in terms of budget and staff. On the other hand, we have an increasing interest in and demand for training and education from an ever-expanding group of individuals and organizations interested in food safety, including international officials. We expect that other Federal agencies and agencies at the State and local levels are also experiencing similar challenges of trying to provide a high-quality training and educational program in spite of declining budgets and small staffs. This situation argues for alternative approaches to providing training in the future.

In our view, coordination and collaboration among all the stakeholders can create the program envisioned in Goal 4. In fact, we have heard both Dr Paul Thompson, Director of the FSIS Technical Service Center, and Mr Joe Corby, a food safety official in New York State, talk at different times about the need to develop a National Food Safety Information and Education Center or National Training Center. However, neither appeared to advocate a central training facility - a single, bricks-and-mortar Institution. They were rather envisioning a central mechanism for bringing together the various elements that already exist -like our FSIS Training Facility - into an integrated and focused food safety effort. This appears to be the training and education equivalent to the evolving Joint Institute for Food Safety Research. We believe this type of coordinating mechanism may be the single most important activity for Goal 4 to build on the strengths of existing efforts wherever they are taking place and fill in the gaps where additional training or education is needed. Two years ago, the HRDS staff began to develop the Food Safety Virtual University (FSVU). We believe that the FSVU can be the structure or framework for this collaborative effort to build upon.

The FSVU concept was designed loosely around a university model. The FSVU however, is not an actual campus, but an effort to utilize rapidly advancing technology to inform "students" about classes as well as actually deliver training and education to a widely dispersed and very diverse audience. The FSVU can make it possible for almost anyone to access training and educational materials. Over time, we would envision that students and visitors to the university will have a comprehensive menu of programs and information to choose from, which will include:

- \* Information and links to formal food safety courses at colleges and universities offered locally in their area,
- \* Information on food safety satellite teleconferences that are offered nationwide,
- \* Electronically formatted training materials and CD-ROMs that can be downloaded at minimal or no cost,
- \* Actual on-line programs that can be taken independently or with the aid of an instructor,
- \* A catalog of self-study programs,

\* A library of digital still images and streamed video for instructors and educators developing programs for students at schools or employees establishments, and

\* Online course registration, student tracking, and certification programs

The FSVU currently includes different "Colleges" to address specific FSIS customers and their needs. For example, the FSVU includes Colleges for Consumer Studies, Animal Production Food Safety, State and Local Studies, International Studies, and others as well. Each College has a Director. Larger Colleges can be further subdivided into Departments with Chairs if necessary. The Directors and Chairs can serve as a Board to provide the direction for the FSVU. They can identify the gaps in food safety knowledge and outline the curriculum in order to address important areas of educational emphasis such as risk assessment, risk management, producer education, statistical process control, epidemiology, public health, and laboratory processes and procedures. Directors can be designated from any agency and be in any location. The staffs supporting the FSVU can also be interagency and literally be located anywhere. Programs offered at the state or local level can be made available through the FSVU to other states with similar needs. International officials trying to understand the U.S. system and requirements for equivalency could benefit from programs offered through the FSVU. In fact, we have material in Mandarin Chinese developed for a recent program in Beijing in the FSVU. Although classroom training can still be a substantial part of the programs offered through the FSVU, travel to training can be significantly reduced and those funds redirected to actual course offerings by increasing the course offerings on line or linking to colleges and universities offering distance learning programs. The student will only know they are getting in touch with high quality programs through a single source.

The FSVU can be found on [www.fsis.usda.gov/ofc/hrds/fsvu.html](http://www.fsis.usda.gov/ofc/hrds/fsvu.html). The FSVU is in its infancy. It is a work in progress. Regrettably, the Agency has not been able to devote additional staff or funding resources to the effort. A lot more needs to be done. So a review of the site has to be looked at in terms of what it can be in the future rather than what it is right now. The HRDS staff has moved it forward within their existing budget and with an eye on the food safety picture beyond FSIS. FSVU represents a framework that can be expanded to encompass all of the stakeholders in food safety. We recognize the current FSVU will probably need to be modified to address the evolving food safety strategy. However, the idea of a national information and education activity is an extremely important one for food safety into the next century. We feel strongly that the strategic plan should include an objective or action item that will create that national coordinating mechanism through the FSVU.

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Please visit our Web site at:  
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